

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
UNITED STATES OF AMERICA,

Plaintiff,

- against -

HAFIZ NASEEM,

Defendant.  
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**VOIR DIRE REQUESTS**

Indictment No.  
07 Cr. 610 (RMB)

**INSTRUCTIONS FOR VOIR DIRE**

The defendant, Hafiz Naseem, respectfully requests that Your Honor include the following questions in the voir dire of this case.

A. **PERSONAL INFORMATION**

1.
  - a) Do you or does a relative or friend work for or with, or applied for a job with the Securities and Exchange Commission, the National Association of Securities Dealers, Inc., the New York Stock Exchange, the American Stock Exchange, or any other agency involved with the stock market?
  - b) If yes, what agency?
  - c) If yes, do you discuss their work with them? Would you be able to disregard that fact and render a verdict based solely on the evidence presented?
2. Have you, or any relative or friend ever been the subject of an investigation by the Securities and Exchange Commission or other agency related to the area of investments?
  - c) If yes, what was it about? Would that fact prevent you from rendering a verdict solely based on the evidence presented?

3. a) Have you ever appeared or testified as a witness in any investigation or legal proceeding?
4. a) Have you ever appeared, been a party to, or testified as a witness in any arbitration before the National Association of Securities Dealers, The New York Stock Exchange, or before any other organization concerning investment related disputes?
  - b) If yes, under what circumstances?
  - c) Would that fact prevent you from rendering a verdict solely based on the evidence presented?
5. Have you ever been involved, or do you expect to become involved, in any legal action or dispute with the United States or any agency, officer, or employee of the United States, or have you ever had any interest in such a dispute?
  - a) If yes, would that fact prevent you from rendering a verdict solely based on the evidence presented?
6. Have you ever sued anyone or been sued by anyone?
  - a) If yes, would that fact prevent you from rendering a verdict solely based on the evidence presented?
7. Have you ever acted as an arbitrator in an investment related dispute?
  - a) Where? When?
  - b) If yes, would that fact prevent you from rendering a verdict solely based on the evidence presented?
8. Do you have any personally held beliefs about those who work on Wall Street; that is in the financial community that might impact on your ability to fair and impartial?

**B. THE PARTIES**

9. This action is being brought by the United States Attorney's Office for the Southern District of New York. The US Attorney is Michael Garcia. Do you know or have any connection with Mr. Garcia?

10. Do you know or have any connection with the following person who will be in the courtroom prosecuting this case?

AUSAs Joshua Klein and Reed Brodsky.

- a) If yes, how do you know the particular lawyer?
- b) If yes, would that knowledge prevent you from rendering a verdict based solely on the evidence presented?
11. Do you know or have any connection with any of the following Agents of various law enforcement organizations?

LIST AGENTS

- a) If yes, how do you know the particular agent?
- b) If yes, would that knowledge prevent you from rendering a verdict based solely on the evidence presented?
12. Do you know, or does any relative or friend know the defendant?
- a) If yes, please explain how you or your relative or friend knows him.
- b) If yes, would this knowledge prevent you from rendering a verdict based solely on the evidence presented?
13. Do you know or have any connection with following defense lawyers:

Michael F. Bachner and Kevin O'Brien.

- a) If yes, how do you know the particular lawyer?
- b) If yes, would that knowledge prevent you from rendering a verdict based solely on the evidence presented?

**E. THE EVIDENCE**

14. The charges in this case allege that Hafiz Naseem as a junior investment banker at Credit Suisse passed material confidential information to Rahim Ajaz regarding companies that were subject to a merger or acquisition. Mr. Naseem denies these allegations.

(a) Have any of you had any experience in the stock market, or in a private investment, that might prevent you from rendering a verdict solely based on the evidence presented?

15. The following companies or locations may be mentioned during the trial. Have you or has any relative or friend had any connection at all with any of the following companies, including investing in any one of them:

LIST COMPANIES NAMED IN THE INDICTMENT

a) If yes, describe those dealings;

b) If yes, would those dealings prevent you from rendering a verdict solely based on the evidence presented?

**F. EVIDENCE RELATING TO THE CHARGES**

16. As I told you earlier, the allegations made in the indictment charge that Mr. Naseem, as a junior investment banker at Credit Suisse passed material confidential information to Rahim Ajaz.

a) Have you had an account with Credit Suisse?

b) Has any member of the panel ever purchased a stock in a company that later merged with or was acquired by another company?

c) Has any member of the panel ever purchased a stock based upon his or her own analysis of the company? Based upon a rumor?

d) Does any member of the panel have a business, social or familial relationship with a stockbroker, or a financial analyst, or investment banker, or compliance officer? Is there anything about that relationship that would prevent you from sitting fairly on this case?

e) You will hear testimony that Mr. Naseem and Mr. Ajaz are Pakistani nationals. Is there anything about that fact which may impact on your ability to be fair? Has any

member of the panel ever traveled to Pakistan? Have any friends or relatives who lived or worked in Pakistan?

f) Has any member of the panel ever had a dispute with their brokerage company or stockbroker over any matter?

g) If so, was litigation pursued?

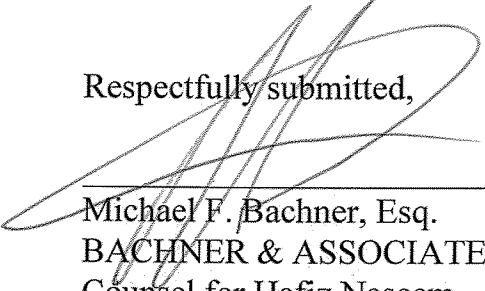
h) Were you represented by counsel?

i) Was the matter brought to trial? Settled? Discontinued?

j) Is any member of the panel on the board of any publicly traded company?

Dated: November 16, 2007  
New York, New York

Respectfully submitted,



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To: Hon. Richard Berman  
AUSA Reed Brodsky  
AUSA Josh Klein